

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
v.) Case No.: 4:21-cr-697 SRC (DDN)
)
DANIEL BERT,)
)
 Defendant.)

MOTION TO LIFT STAY ON PROCEEDINGS

COMES NOW counsel for Defendant, Daniel Bert, and respectfully requests this Court enter an order lifting the previously imposed stay on all deadlines and proceedings in this matter.

As grounds therefore, counsel states as follows:

1. Defendant was ordered to appear for a bond status hearing on January 27, 2023.
2. Defendant failed to appear on that date and a warrant was issued for his arrest.
3. On April 12, 2023, counsel filed a Motion to Stay proceedings in this matter as there had been no communication with defendant for multiple months.
4. On April 13, 2023, this Court granted counsel's motion.
5. On May 11, 2023, defendant was taken into custody in the Southern District of Florida and will be transported back to the Eastern District of Missouri.
6. Undersigned requests that the previously entered order to stay proceedings be lifted.

WHEREFORE, undersigned respectfully requests this Court enter an order lifting the previously imposed stay on all deadlines and proceedings in this matter.

Respectfully submitted,

By:

/s/ Marc Johnson
Marc Johnson, #580655 MO
Attorney for Defendant
120 S. Central Avenue, Suite 130
Clayton, Missouri 63105
(314) 862-4332

CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2023, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mr. Kyle T. Bateman, Assistant United States Attorney.

/s/ Marc Johnson
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